EXHIBIT 221

Case: 1:17-md-02804-DAP Doc #: 1964-9 Filed: 07/23/19 2 of 4. PageID #: 163501

Message

From: McPherson, Carolyn [/O=CAH/OU=CARDINAL HEALTH/CN=RECIPIENTS/CN=CAROLYN.MCPHERSON]

Sent: 1/8/2008 1:49:34 PM

To: Rausch, Nicholas [/O=CAH/OU=CARDINAL HEALTH/CN=RECIPIENTS/CN=NICHOLAS.RAUSCH]

Subject: revised instructions for deloitte

Attachments: PROCEDURE FOR THRESHOLD LIMIT DETERMINATION - Phase 2 - Deloitte - Revised.doc

Carolyn McPherson
Director, Quality & Regulatory Affairs
Supply Chain Services
Cardinal Health
7000 Cardinal Place
Dublin, OH 43017

Office: 614-757-7169 Cell: 614-893-5280 Fax: 614-652-7486

PROCEDURE FOR DETERMINING THE THRESHOLD LIMIT FOR A DRUG FAMILY (Used for Phase 2 - Revised)

- 1. Run report for a particular class of customers by drug family to include, by unit 12 month drug sales by month (12/06 through 11/07), total and average and total drug sales, 12 month Rx sales by month and total. (Customers included are all active customers, even those with no Rx sales within the timeframe)
- 2. Copy sheet and on copied sheet:
 - a. Sort by division number column. Delete Parmed (division 94).
 - b. Sort by Customer Name column and delete ZZ accounts
 - c. Sort by Total Rx sales column and delete all negative values and 0 sale \$ accounts in Total Rx sales
 - d. Delete sales records with null DEA # values
 - e. Compare DEA Base Numbers with those in "SKU List"; Use only Base Numbers that are in the SKU List; (Note: DEA Base Number 7379 should be added to physical SKU List)
 - f. Combine customers data with same DEA # will be sizing by DEA # and doing averages by DEA#
 - g. Identify groups for each DEA #/DEA Base Code Combination.
 - i. If only one group for the DEA #, then use that one
 - ii. If more than one group use the Retail group if any one of the DEA #'s belong to Retail
 - iii. If more than one group but none are in the Retail Group, then use the one with the greatest total sales volume
 - iv. If more than one group but none are in the Retail Group, and more than one are tied for the greatest total sales volume; use total sales amount as tie-breaker
 - v. If more than one group but none are in the Retail Group, and more than one are tied for the greatest total sales volume and total sales amount; then ask CH for action (use managed care for the one below)

| DEA Base Number | DEA Number | CountOfGroupNo | MinOfCustType | MaxOfCustType |
|-----------------|------------|----------------|---------------|---------------|
| 2887 | BP6600539 | 2 | Hospital | Managed Care |

- h. For each DEA #/DEA Base Code/Group Combination; At Bottom of column B, perform a =Count(B2:B??) on column B = Total accounts
- i. Record total number of customers remaining
- j. Divide the Total number of accounts by 3 (if uneven, place extra in middle size category)
- 3. Create 3 copies of the final version of Sheet in #2, and name Large, Medium and Small
 - a. On the Large sheet, delete all accounts except those in the Large category
 - b. On the Medium sheet, delete all accounts except those in the Medium category
 - c. On the Small sheet, delete all accounts except those in the Small category
 - d. Record the number of accounts in each category and the sales \$ range
- 4. On each size category sheet:
 - a. Sort by Total units column and delete those accounts with 0 or negative values in Total units.
 - b. Sort each category sheet by the Average units per month column

- 5. On each size category sheet in turn, perform the following:
 - a. =Count(B2:B??) on column B = Total accounts
 - b. =SUM(Q2:Q??)/12/Total # accounts = average monthly drug units per customer
 - c. Average monthly drug units by customer X 3 = threshold Limit
- 6. Record all values in #5
- 7. Complete the WORD document, Threshold Calculation Worksheet, for each customer class/drug family name (base code).
 - a. For Final Thresholds in each size category:
 - i. If the average is 5000 doses or less, round the average down to the next lowest 100. Ex: average = 3649, round to 3600
 - ii. If the average is 5000 doses or greater, round the average down to the next lowest 1000. Ex: average = 8978, round to 8000
 - b. For the Absolute Maximum Threshold, multiply the rounded Large Account Final Threshold X 3.
- 8. Create a final spreadsheet of all customers (including all negative and 0 accounts but excluding Parmed and ZZ accounts) by DEA #*, Distribution Center # that services the account and dosage limit for that size customer for the drug base code.

Ex: DEA# DC 9720 Limit (doses) AB1234567 34 9000

As per e-mail from Carolyn McPherson on 1/3/2008 8:26 AM:

Joe – Got to thinking about a couple things and wanted to run them by you:

1. If you have multiple distribution center numbers servicing one DEA#, be sure to combine the sales to get the accurate sales volume of that DEA number for sizing purposes. However, when the final report is created to show DEA#s and sizes/Limits for each base code, we will need you to show the same DEA and both DC#s.

| EX: | DEA | DC | Base code 1234 Limit | Base code 4567 |
|-----|-----------|----|----------------------|----------------|
| etc | | | | |
| | AB1234567 | 2 | 9000 | 12000 |
| | AB1234567 | 4 | 9000 | 12000 |

- Reporting: I see 3 reports that we will need give me a call and we can discuss further
 - a. List of all base codes and the limits by size of customer and customer type

| EX: | Cust type | Base code | Small | Medium | Large | |
|-----|-----------|-----------|-------|--------|-------|--|
| | Retail | 1234 | 9000 | 14000 | 25000 | |
| | Retail | 4567 | 12000 | 18000 | 22000 | |
| | Hospital | 1234 | 15000 | 20000 | 25000 | |

- b. List of all DEA#s by DC with each base code limits as in #1 above
- c. A spreadsheet of each DEA# at each DC with 1 line each for each base code and the limit this is for IT to load their programming is already written to handle this

| EX: | DEA | DC | Base code | Limit |
|-----|-----------|----|-----------|-------|
| | AB1234567 | 2 | 1234 | 9000 |
| | AB1234567 | 2 | 4567 | 12000 |
| | AB1234567 | 2 | 1111 | 3000 |
| | AB1234567 | 2 | 5555 | 20000 |